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8 **U.S. DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA (SAN DIEGO)**  
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13 **PERFECT 10, INC.**

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15 **Plaintiff**

16 **IWEB GROUP, INC., IWEB**  
17 **INTELLECTUAL PROPERTY INC.,**  
18 **IWEB TECHNOLOGIES, INC., AND**  
19 **JOHN DOES 1-100**

20 **Defendants.**  
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**Case No. 13-CV- 0328 – BTM -**  
**BLM**

**JURY TRIAL DEMANDED**

**DECLARATION OF ERIC**  
**CHOUINARD, IN SUPPORT OF**  
**DEFENDANT IWEB GROUP'S**  
**MOTION TO DISMISS**  
**COMPLAINT**

22 I, Eric Chouinard, hereby declare pursuant to 28 U.S.C. §1746 as follows:

- 23 1. My name is Eric Chouinard and I am the Co-Founder of iWeb Group, Inc., a  
24 non-operating Canadian holding company, which has been sued in this U.S.  
25 District Court for the Southern District of California action. I am familiar with  
26 the facts underlying this case, and I am authorized to submit this Declaration, for  
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CASE NO. 13CV0328 BTM BLM

1 Defendant iWeb Group, Inc. ("iWeb Group"), in support of Defendants' motion  
2 to dismiss the complaint filed by Perfect 10, a California corporation.

3 2. As a holding company, iWeb Group conducts no operations of its own; rather,  
4 iWeb Group owns the stock of its operating companies which, in turn, license  
5 intellectual property to support and primarily to house servers used by our  
6 customers in several Montreal, Quebec, Canada buildings specifically designed  
7 for such operations. Each such subsidiary maintains its own corporate books and  
8 records to support its distinct operations.

9 3. iWeb Group is headquartered in Canada at 20 Place du commerce, Nun's Island,  
10 Montreal (Quebec) Canada H3D 1Z6.

11 4. iWeb Group has never had any employees, facilities (including any server  
12 farms), or real estate of any kind in California.

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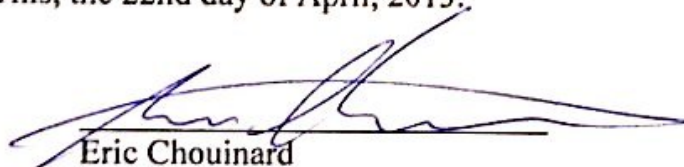
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1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct. Executed this 22d day of April,  
3 2013, at Montreal, Quebec, Canada.

4 FURTHER AFFIANT SAYETH NOT.

5 This, the 22nd day of April, 2013.

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7   
8 Eric Chouinard  
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